

STATEMENT OF BASIS

as required by LAC 33:IX.3109, for draft **Louisiana Pollutant Discharge Elimination System Permit No. LA0032379, AI 19346; PER20060001** to discharge to waters of the **State of Louisiana** as per LAC 33:IX.2311.

The **permitting authority** for the Louisiana Pollutant Discharge Elimination System (LPDES) is:

Louisiana Department of Environmental Quality
Office of Environmental Services
P. O. Box 4313
Baton Rouge, Louisiana 70821-4313

- I. **THE APPLICANT IS:** Town of Olla
 Olla Wastewater Treatment Facility
 P.O. Box 223
 Olla, LA 71465

- II. **PREPARED BY:** Ronda Burtch

- DATE PREPARED:** March 7, 2007

- III. **PERMIT ACTION:** reissue LPDES permit LA0032379, AI 19346; PER20060001

 LPDES application received: December 11, 2006

 LPDES permit issued: August 1, 2001
 LPDES permit expired: September 30, 2006

IV. **FACILITY INFORMATION:**

- A. The application is for the discharge of treated sanitary wastewater from a publicly owned treatment works serving the Town of Olla.

- B. The permit application does not indicate the receipt of industrial wastewater.

- C. The facility is located approximately 2,000 feet south of the intersection of U.S. Hwy. 165 and LA 124 in Olla, LaSalle Parish.

- D. The treatment facility consists of an activated sludge oxidation pond with mechanical aerators, and (2) rock reed filters. Disinfection is by ultraviolet light.

- E. Outfall 001

 Discharge Location: Latitude 31° 54' 03" North
 Longitude 92° 13' 06" West

 Description: treated sanitary wastewater

 Design Capacity: 0.210 MGD

 Type of Flow Measurement which the facility is currently using:

 Continuous Flow Meter

V. **RECEIVING WATERS:**

The discharge is into Bear Branch, thence into Chickasaw Creek, thence into Castor Creek in segment 081501 of the Ouachita River Basin. This segment is not listed on the 303(d) list of impaired waterbodies.

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The designated uses and degree of support for Segment 081501 of the Ouachita River Basin are as indicated in the table below^{1/}:

Overall Degree of Support for Segment 081501	Degree of Support of Each Use						
	Primary Contact Recreation	Secondary Contact Recreation	Propagation of Fish & Wildlife	Outstanding Natural Resource Water	Drinking Water Supply	Shell fish Propagation	Agriculture
Partial	Full	Full	Not Supported	N/A	N/A	N/A	N/A

^{1/}The designated uses and degree of support for Segment 081501 of the Ouachita River Basin are as indicated in LAC 33:IX.1123.C.3, Table (3) and the 2004 Water Quality Management Plan, Water Quality Inventory Integrated Report, Appendix A, respectively.

VI. ENDANGERED SPECIES:

The receiving waterbody, Subsegment 081501 of the Ouachita River Basin, is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U. S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated September 29, 2006 from Watson (FWS) to Brown (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. It was determined that the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat.

VII. HISTORIC SITES:

The discharge is from an existing facility location, which does not include an expansion beyond the existing perimeter. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the 'Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits' no consultation with the Louisiana State Historic Preservation Officer is required.

VIII. PUBLIC NOTICE:

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit modification and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

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For additional information, contact:

Ms. Ronda Burtch
Permits Division
Department of Environmental Quality
Office of Environmental Services
P. O. Box 4313
Baton Rouge, Louisiana 70821-4313

IX. PROPOSED PERMIT LIMITS:

Subsegment 081501, Castor Creek - Headwaters to Little River, is not listed on LDEQ's Final 2004 303(d) List as impaired. However, subsegment 081501 was previously listed as impaired for organic enrichment/low DO, TDS, and chlorides, for which the below TMDLs have been developed. The Department of Environmental Quality reserves the right to impose more stringent discharge limitations and/or additional restrictions in the future to maintain the water quality integrity and the designated uses of the receiving waterbodies based upon additional TMDLs and/or water quality studies. The DEQ also reserves the right to modify or revoke and reissue this permit based upon any changes to established TMDLs for this discharge, or to accommodate for pollutant trading provisions in approved TMDL watersheds as necessary to achieve compliance with water quality standards.

The following TMDLs have been established for subsegment 081501:

Castor Creek Watershed TMDL for Biological Oxygen-Demanding Substances

Per the TMDL, "All of the dischargers located in this watershed are small and discharge into tributaries of Castor Creek and need not be included in a model of this scale. It is unlikely that they will have an impact on the targeted waterbody due to the small load and/or the distance from the waterbody named in the 303(d) lists. They fall within one of several state or regional policies that govern permit limitations." This facility was previously given limits of 20 mg/l BOD₅ / 20 mg/l TSS / 5 mg/l NH₃-N / 5 mg/l DO based upon an update to the Original Basin Plan for the Ouachita River Basin, approved on December 1, 1986. Therefore, the limitations will remain as previously permitted.

Castor Creek Watershed TMDL for Chlorides and Salinity/Total Dissolved Solids (TDS)

Per the TMDL, "All point source dischargers located in this watershed are small municipal or industrial wastewater facilities that discharge into tributaries of Castor Creek. Currently none of these facilities have permit limits for chlorides or TDS. Point source dischargers contribute, on average, less than one percent of the harmonic mean flow. With such a miniscule portion of the overall flow being contributed by point sources it can be surmised that the wastewater dischargers in the watershed have no real impact on the overall loading of chlorides and TDS to Castor Creek. This is further demonstrated that point source discharges have almost no affect on instream concentrations of chlorides and TDS. Since point sources do not represent a significant source of chloride or TDS, these TMDLs only address the non-point source contribution of chloride and TDS. Therefore, no limitations for chlorides and TDS will be included in this permit.

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Final Effluent Limits:

OUTFALL 001

Final limits shall become effective on the effective date of the permit and expire on the expiration date of the permit.

Effluent Characteristic	Monthly Avg. (lbs./day)	Monthly Avg.	Weekly Avg.	Basis
CBOD ₅	35	20 mg/l	30 mg/l	Limits are set in accordance with an update to the Original Basin Plan for the Ouachita River Basin, approved on December 1, 1986.
TSS	35	20 mg/l	30 mg/l	Limits are set in accordance with an update to the Original Basin Plan for the Ouachita River Basin, approved on December 1, 1986.
Ammonia-Nitrogen	9	5 mg/l	10 mg/l	Limits are set in accordance with an update to the Original Basin Plan for the Ouachita River Basin, approved on December 1, 1986.
Dissolved Oxygen	N/A	5 mg/l	N/A	Limits are set in accordance with an update to the Original Basin Plan for the Ouachita River Basin, approved on December 1, 1986.

****This Dissolved Oxygen limit is the lowest allowable average of daily discharges over a calendar month. When monitoring is conducted, the Dissolved Oxygen shall be analyzed immediately, as per 40 CFR 136.3.**

Other Effluent Limitations:

1) Fecal Coliform

The discharge from this facility is into a water body which has a designated use of Primary Contact Recreation. According to LAC 33:IX.1113.C.5.b.i, the fecal coliform standards for this water body are 200/100 ml and 400/100 ml. Therefore, the limits of 200/100 ml (Monthly Average) and 400/100 ml (Weekly Average) are proposed as Fecal Coliform limits in the permit. These limits are being proposed through Best Professional Judgement in order to ensure that the water body standards are not exceeded, and due to the fact that existing facilities have demonstrated an ability to comply with these limitations using present available technology.

2) pH

According to LAC 33:IX.3705.A.1., POTW's must treat to at least secondary levels. Therefore, in accordance with LAC 33:IX.5905.C., the pH shall not be less than 6.0 standard units nor greater than 9.0 standard units at any time.

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3) Solids and Foam

There shall be no discharge of floating solids or visible foam in other than trace amounts in accordance with LAC 33:IX.1113.B.7.

X. PREVIOUS PERMITS:

LPDES Permit No. LA0032379: Issued: August 1, 2001
 Expired: September 30, 2006

<u>Effluent Characteristic</u>	<u>Discharge Limitations</u>		<u>Monitoring Requirements</u>	
	<u>Daily Avg.</u>	<u>Daily Max.</u>	<u>Measurement Frequency</u>	<u>Sample Type</u>
Flow	Report	Report	Continuous	Recorder
CBOD ₅	20 mg/l	30 mg/l	2/month	Grab
TSS	20 mg/l	30 mg/l	2/month	Grab
Ammonia-Nitrogen	5 mg/l	10 mg/l	2/month	Grab
Dissolved Oxygen	N/A	5 mg/l	2/month	Grab
Fecal Coliform Colonies	200	400	2/month	Grab

The permit contains pollution prevention language.

XI. ENFORCEMENT AND SURVEILLANCE ACTIONS:

A) Inspections

A review of the files indicates the following inspections were performed during the period beginning January 29, 2005 and ending January 29, 2007 for this facility.

Date: September 16, 2005

Inspector: LDEQ

Findings and/or Violations:

1. One cell oxidation pond had a slight growth of algae/duckweed on the surface of the pond.
2. Effluent was light green in color.

Date: September 25, 2006

Inspector: LDEQ

Findings and/or Violations:

1. WWTP consists of a one-cell oxidation pond with aeration chamber and UV disinfection.
2. DMR review revealed one fecal coliform excursion in both January 2006 and February 2006 and two fecal coliform excursions in August 2006.

B) Compliance and/or Administrative Orders

A review of the files indicates that there are no recent enforcement actions administered against this facility.

C) DMR Review

A review of the discharge monitoring reports for the period beginning September 1, 2004 through September 30, 2006 has revealed the following violations:

Month	Parameter	DMR Reported Value	Permit Limit
December 2004	DO, Monthly Avg.	4.15 mg/l	5 mg/l
February 2005	Ammonia-Nitrogen, Monthly Loading	8.17 lbs/day	4 lbs/day

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July 2005	DO, Monthly Avg.	3.42 mg/l	5 mg/l
August 2005	DO, Monthly Avg.	4.5 mg/l	5 mg/l
September 2005	Ammonia-Nitrogen, Monthly Loading	5.25 lbs/day	4 lbs/day
October 2005	DO, Monthly Avg.	3.47 mg/l	5 mg/l
	Ammonia-Nitrogen, Monthly Loading	9.25 lbs/day	4 lbs/day
January 2006	DO, Monthly Avg.	3.21 mg/l	5 mg/l
	Fecal Coliform, Weekly Avg.	1,700 col/100 ml	400 col/100 ml
February 2006	Fecal Coliform, Weekly Avg.	1,100 col/100 ml	400 col/100 ml
April 2006	DO, Monthly Avg.	4 mg/l	5 mg/l
June 2006	Ammonia-Nitrogen, Monthly Loading	6.45 lbs/day	4 lbs/day
August 2006	Fecal Coliform, Monthly Avg.	840 col/100 ml	200 col/100 ml
	Fecal Coliform, Weekly Avg.	980 col/100 ml	400 col/100 ml
September 2006	DO, Monthly Avg.	4.2 mg/l	5 mg/l
	Fecal Coliform, Monthly Avg.	447 col/100 ml	200 col/100 ml
	Fecal Coliform, Weekly Avg.	570 col/100 ml	400 col/100 ml

XII. ADDITIONAL INFORMATION:

The Department of Environmental Quality reserves the right to impose more stringent discharge limitations and/or additional restrictions in the future to maintain the water quality integrity and the designated uses of the receiving water bodies based upon additional water quality studies and/or TMDL's. The DEQ also reserves the right to modify or revoke and reissue this permit based upon any changes to established TMDL's for this discharge, or to accommodate for pollutant trading provisions in approved TMDL watersheds as requested by the permittee and/or as necessary to achieve compliance with water quality standards. Therefore, prior to upgrading or expanding this facility, the permittee should contact the Department to determine the status of the work being done to establish future effluent limitations and additional permit conditions

Final effluent loadings (i.e. lbs/day) have been established based upon the permit limit concentrations and the design capacity of 0.210 MGD.

Effluent loadings are calculated using the following example:

$$\text{BOD: } 8.34 \text{ lb/gal} \times 0.210 \text{ MGD} \times 20 \text{ mg/l} = 35 \text{ lb/day}$$

At present, the **Monitoring Requirements, Sample Types, and Frequency of Sampling** as shown in the permit are as previously permitted.

<u>Effluent Characteristics</u>	<u>Monitoring Requirements</u>	
	<u>Measurement Frequency</u>	<u>Sample Type</u>
Flow	Continuous	Recorder
CBOD ₅	2/month	Grab
Total Suspended Solids	2/month	Grab
Ammonia-Nitrogen	2/month	Grab
Dissolved Oxygen	2/month	Grab
Fecal Coliform Bacteria	2/month	Grab
pH	2/month	Grab

Pretreatment Requirements

Based upon consultation with LDEQ pretreatment personnel, general pretreatment language will be used due to the lack of either an approved or required pretreatment program.

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Pollution Prevention Requirements

The permittee shall institute or continue programs directed towards pollution prevention. The permittee shall institute or continue programs to improve the operating efficiency and extend the useful life of the facility. The permittee will complete an annual Environmental Audit Report **each year** for the life of this permit according to the schedule below. The permittee will accomplish this requirement by completing an Environmental Audit Form which has been attached to the permit. All other requirements of the Municipal Wastewater Pollution Prevention Program are contained in Part II of the permit.

The audit evaluation period is as follows:

Audit Period Begins	Audit Period Ends	Audit Report Completion Date
Effective Date of Permit	12 Months from Audit Period Beginning Date	3 Months from Audit Period Ending Date

XIII TENTATIVE DETERMINATION:

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to reissue a permit for the discharge described in this Statement of Basis.

XIV REFERENCES:

Louisiana Water Quality Management Plan / Continuing Planning Process, Vol. 8, "Wasteload Allocations / Total Maximum Daily Loads and Effluent Limitations Policy," Louisiana Department of Environmental Quality, 2005.

Louisiana Water Quality Management Plan / Continuing Planning Process, Vol. 5, "Water Quality Inventory Section 305(b) Report," Louisiana Department of Environmental Quality, 1998.

Louisiana Administrative Code, Title 33 - Environmental Quality, Part IX - Water Quality Regulations, Chapter 11 - "Louisiana Surface Water Quality Standards," Louisiana Department of Environmental Quality, 2004.

Louisiana Administrative Code, Title 33 - Environmental Quality, Part IX - Water Quality Regulations, Subpart 2 - "The LPDES Program," Louisiana Department of Environmental Quality, 2004.

Low-Flow Characteristics of Louisiana Streams, Water Resources Technical Report No. 22, United States Department of the Interior, Geological Survey, 1980.

Index to Surface Water Data in Louisiana, Water Resources Basic Records Report No. 17, United States Department of the Interior, Geological Survey, 1989.

LPDES Permit Application to Discharge Wastewater, Town of Olla, Olla Wastewater Treatment Facility, December 11, 2006.